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May 31, 2023

VIA ECF ONLY

Hon. Brian M. Cogan, U.S.D.J.
U.S. District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Full Circle United, LLC v. Bay Tek Entm't, Inc., No. 1:20-cv-03395-BMC

Dear Judge Cogan:

We write on behalf of Defendant/Counterclaim Plaintiff Bay Tek Entertainment, Inc. ("Bay Tek") to request a two-week extension of time, from June 9, 2023 to June 23, 2023, to file Bay Tek's reply papers in support of its Motion for Partial Summary Judgment, for the reasons set forth herein.

The current June 9, 2023 deadline was set by the Court on May 5, 2023 pursuant to a request from Bay Tek. This is the second extension that Bay Tek is seeking of the deadline to file its Reply Memorandum. Plaintiff/Counterclaim Defendant Full Circle United, LLC and Counterclaim Defendant Eric Pavony (together, "FCU") do not oppose this request.

Bay Tek respectfully seeks for the deadline to be extended on the following grounds:

- Multiple key members of Bay Tek's outside litigation team, including its lead counsel, are currently preparing for an upcoming trial that is expected to last six weeks. The simultaneous preparation for that trial is consuming a substantial amount of counsel's resources.
- Bay Tek's team is continuing to evaluate and respond to FCU's Rule 56.1 Counterstatement and also address matters raised in FCU's Response to Bay Tek's Rule 56.1 Statement. During this process, Bay Tek has identified what it believes to be numerous mischaracterizations of documents and deposition testimony in FCU's opposition papers. Addressing these issues has taken more time than Bay Tek previously had anticipated.
- One of Bay Tek's team members remains on parental leave, which continues to affect staffing.
- Bay Tek has spent and is continuing to spend a great deal of time determining how best, from a practical and logistical standpoint, to present its responses to the issues FCU has



Hon. Brian M. Cogan, U.S.D.J.
May 31, 2023
Page 2

raised and the evidence it has submitted. This has ended up taking longer than Bay Tek previously had anticipated.

Accordingly, Bay Tek respectfully requests that it be permitted to file its Reply Memorandum in support of its Motion by **June 23, 2023**.

Bay Tek greatly appreciates the Court's consideration of this request.

Respectfully,

/s/ Mark C. Humphrey

Mark C. Humphrey
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